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 Counsel for Defendant BUILD OUR CENTER

UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

DREW RIBAR,

Plaintiff,

Case No. 3:24-cv-00526

v.

WASHOE COUNTY; WASHOE COUNTY
 LIBRARY SYSTEM; JEFF SCOTT; THANH
 NGUYEN; JAMIE HEMINGWAY; BEATE
 WEINERT; STACY MCKENZIE; JONNICA
 BOWEN; BEN WEST; BUILD OUR
 CENTER, INC.; STACEY SPAIN;
 ANGELINE PETERSON; CHRISTOPHER
 DANIELS; DEPUTIES ROTHKIN, SAPIDA,
 GOMEZ; KRISTEN RYAN, JENNIFER
 COLE; and JOHN/JANE DOES 1-10;

Defendants.

**DEFENDANT
 BUILD OUR CENTER'S
 RESPONSE TO PLAINTIFF
 DREW RIBAR'S
 MOTION TO STRIKE
 DEFENDANT BUILD OUR
 CENTER'S EXHIBITS 6 AND 7**

Defendant BUILD OUR CENTER INC., by and through its undersigned counsel, respectfully files this Response to *Plaintiff's Motion to Strike Defendant Build Our Center's Exhibits 6 and 7* [ECF 136].

This Response is made and based upon all records and pleadings on file herein, together with every exhibit attached hereto (each of which is incorporated herein by reference), as well as the points and authorities set forth directly below.

In support of this Response, BOC states as follows:

MEMORANDUM OF POINTS AND AUTHORITIES

To the extent a response is necessary to *Plaintiff's Motion to Strike Defendant Build Our Center's Exhibits 6 and 7* [ECF 136], BOC responds as follows: *Defendant Build Our Center's Motion for Case Management Conference, Restraining Order, and Sanctions* [ECF 130] was filed due to Mr. Ribar's alarming

1 and escalating conduct from September 8, 2025, through September 18, 2025,
2 which included pursuing BOC board members and volunteers at their
3 workplaces and sending vexatious emails to Counsel Kertis and Jerry C. Carter,
4 Esq. and loitering on Sierra Crest's property after business hours with no lawful
5 purpose. Rather than address his troubling behavior, Mr. Ribar doubles down,
6 ignoring the real and present danger created by his vexatious litigation and toxic
7 online content. His "Motion to Strike" lacks any legal basis or substantive value
8 and serves only to distract the Court from the real issues.

9 DATED September 30, 2025. SIERRA CREST BUSINESS LAW GROUP

10
11 By: /s/ Alison R. Kertis, Esq.
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CERTIFICATE OF SERVICE

I certify that I am an employee of the SIERRA CREST BUSINESS LAW GROUP who, on the below-written date, caused a true copy of the foregoing to be transmitted via email and also to be filed using the above-entitled Court's electronic filing (CM/ECF) system which will automatically e-serve the same) on the person(s) and/or entity(ies) set forth directly below:

Drew Ribar

480 Pershing Lane, Washoe Valley, NV 89704
(775) 223-7899
const2audit@gmail.com
Plaintiff in propria persona

Lindsay L. Liddell (SBN 14079)

Andrew Cobi Burnett (SBN 16505)

DEPUTY DISTRICT ATTORNEYS

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cburnett@da.washoecounty.gov

(775) 337-5700

Counsel for Plaintiffs Washoe County and its Library System, Jeff Scott, Stacy Mckenzie, Jonnica Bowen, Jennifer Cole; Deputy C. Rothkin, Deputy R. Sapida, and Sgt. George Gomez

DATED: September 30, 2025.

/s/ Monica R. Leazer

an employee of the
SIERRA CREST BUSINESS LAW GROUP

INDEX OF EXHIBITS

to

DEFENDANT BUILD OUR CENTER'S RESPONSE TO
 PLAINTIFF DREW RIBAR'S MOTION TO STRIKE
 DEFENDANT BUILD OUR CENTER'S EXHIBITS 6 AND 7

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Ribar vs. Washoe County, et alia
(Case No. 3:24-cv-00526)

Exhibit No.	Exhibit Description	Pages (+ Cover)
	None,	
	Not applicable.	